

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

In Re:
SUPERIOR TLC HOME
HEALTH CARE, LLC
Debtor

§
§
§
§

Case No. 19-31038-HCM

Chapter 7

TRUSTEE'S OBJECTION TO CLAIM # 2 OF
LiftFund, Inc., WITH NOTICE THEREOF

This is an objection to your claim in this bankruptcy case. This objection asks the Court to disallow (eliminate), reduce, or modify your claim as set forth in this objection. If you do not file a written response to this objection within 30 days from the date of mailing of this objection, the Court may disallow (eliminate), reduce, or modify your claim as set forth in this objection, without a hearing being held.

Any response to this objection must explain your position and be timely filed with the United States Bankruptcy Clerk, Western District of Texas, 511 E. San Antonio Ave Rm 444 El Paso TX 79901. If a timely response is filed, the Court will then set a hearing on the objection and you will be provided with notice of the date, time, and place of the hearing. If you do not attend the hearing, the Court may decide that you do not oppose the objection to your claim.

1. Ronald Ingalls, Trustee, objects to the secured claim # 2 of LiftFund, Inc., in the amount of \$9,717.21, filed on 10/01/2019, in the above styled case, for the reason that he has not administered and liquidated any property to which claimant's lien attaches.

2. Upon information and belief, any collateral remaining when the case was filed is of inconsequential value, and has not been sold. The secured claim # 2 of LiftFund, Inc. should be allowed as a general unsecured claim, in the amount asserted in the proof of claim.

WHEREFORE, PREMISES CONSIDERED, Ronald Ingalls, Trustee, prays that the secured claim # 2 of LiftFund, Inc., be allowed as a general unsecured claim, in the amount asserted in the proof of claim, and for other just relief.

Respectfully submitted,

/s/ Ronald Ingalls
Ronald Ingalls
CHAPTER 7 TRUSTEE
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CERTIFICATE OF SERVICE

The signature above certifies that a true and correct copy of the foregoing document has been served by first class, U.S. mail, postage prepaid on December 5, 2019, on:

LiftFund, Inc.
c/o DUNN PLLC
405 Main Street Ste 836
Houston, TX 77002

ERIC M. MARTINEZ
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United States Trustee - EP12
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San Antonio, TX 78205-2055

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CARE, LLC
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